

Administration

Water Pollution Control

Air Quality

(702) 486-2850

Federal Facilities

Corrective Actions

Waste Management

Facsimile 486-2863

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

(Las Vegas Office)

1771 E. Flamingo Road, Suite 121-A

Las Vegas, Nevada 89119-0837

September 2, 2003

Maryland Square Shopping Center Limited
Liability Company/Herman Kishner Trust
c/o Paul Lal
Dickerson, Dickerson, Consul & Pocker
Rainbow Corporate Center, Suite 350
777 North Rainbow Boulevard
Las Vegas, NV 89107

**Subject: Preliminary Corrective Action Plan (CAP) and
Meeting on August 26, 2003**
**Facility: Maryland Square Shopping Center
3661 South Maryland Parkway
Las Vegas, NV**
Facility ID#: H-000086

Dear Mr. Lal:

The Nevada Division of Environmental Protection (NDEP) received and reviewed the Preliminary Corrective Action Plan (Preliminary CAP), dated June 27, 2003, prepared by your consultant, Converse Consultants (Converse), for the above-referenced facility. The Preliminary CAP was also the subject of a meeting between Paul Lal of Dickerson, Dickerson, Consul & Pocker; Sonja Inglin of Jenkins & Gilchrist, LLP; Kurt Goebel and Andrea Moericke of Converse; and, Todd Croft, Christine Andres and Shannon Harbour of NDEP on August 26, 2003. Please accept this letter as a summary of the NDEP comments on certain aspects of the Preliminary CAP and of action items, discussed at the meeting, which the NDEP is requiring:

1. Converse will make inquiry to see whether it can determine if any de-watering is being conducted on the Boulevard Mall property and report to the NDEP the results of that inquiry.

2. One groundwater monitoring well will be installed to the northwest of MW-13. Another monitoring well will be installed to the east of MW-13. Additionally, characterization of the groundwater to the east of the Boulevard Mall is required and is to be addressed in the Workplan which, per Comment No. 7 below, is to be submitted to the NDEP (please see Comment No. 7, below, for a timeframe).
3. NDEP concurs in the proposed use of HRC between the Parking Garage and the Boulevard Mall to address the further migration of the contaminant plume beneath the Boulevard Mall. In order to assess the spacing of HRC injection points, four slug tests will be performed using the monitoring wells located between the Parking Garage and the Boulevard Mall (MW-4, MW-5, MW-6, and one new well). Once the results of the slug tests are available, the density of HRC injection points will be determined. The injection points will then be installed using push technology instead of installing injection wells. Deployment of HRC will commence following installation of the injection points (please see Comment No. 7, below, for a timeframe).
4. A pilot test for Soil Vapor Extraction for impacted soil will be conducted in the source area (please see Comment No. 7, below, for a timeframe).
5. A pilot test for C-sparging of the groundwater will be conducted in the source area and along the eastern border of Maryland Parkway (i.e., in the vicinity of MW-4, MW-5 and MW-6; please see Comment No. 7, below, for a timeframe).
6. Quarterly groundwater monitoring and sampling of all existing monitoring wells will be conducted by Converse beginning with the Third Quarter 2003. The reduction in the frequency and scope of monitoring proposed in the Preliminary CAP is not being addressed at this time.
7. **A Workplan detailing the actions identified above in Comment Nos. 1 to 5 will be submitted by Converse to the NDEP by September 12, 2003. Once concurrence for the Workplan is received from the NDEP, installation of the additional groundwater monitoring wells, characterization of the groundwater to the east of the Boulevard Mall, and the slug testing will commence immediately. HRC deployment will immediately follow receipt of slug testing results. The Pilot Studies for SVE and C-sparging will be completed by October 30, 2003. Based on the results of the Pilot Studies, the Preliminary CAP will be finalized.**
8. Once the Pilot Studies are completed, a final corrective action plan will be proposed. The final corrective action may propose (and NDEP will consider) remedial measures other than those addressed in the Pilot Studies, including with respect to impacted soil, *in situ* chemical oxidation ("ISCO"). As discussed, however, NDEP has limited experience with ISCO, and based on that experience, concerns about the

appropriateness of its use in certain situations (i.e., near residential areas) and about other aspects of its use, such as the production of degradation by-products associated with certain oxidants and whether an underground injection permit would be required or could be obtained.

9. In finalizing the corrective action plan, Converse is to provide modeling data regarding the use of both C-sparging and HRC (assuming that C-sparging is one of the proposed technologies for addressing groundwater in the final corrective action plan).

Please do not hesitate to call me at 702-486-2858 or email me at candre@ndep.nv.gov if you have any questions or comments. The NDEP looks forward to moving ahead with the further site characterization and remediation at this facility.

Sincerely,



Christine D. Andres ESII
Remediation and LUST Branch
Bureau of Corrective Actions
NDEP-Las Vegas Office

CDA:cda

cc: Todd Croft, Supervisor, Bureau of Corrective Actions, NDEP Las Vegas, NV
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